



Scoping Summary
And
Response to Comments Received during SEIS Scoping

Washington State Department of Natural Resources
Loomis Planning Process

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I. Overview

The Washington Department of Natural Resources (DNR) is combining the Loomis Landscape Planning Process and the Supplemental Environmental Impact Statement (SEIS) process for amending the 1996 Loomis Landscape Plan. The State Environmental Policy Act (SEPA) process was formally initiated with the scoping notice released on February 22, 2002 and included at a meeting held March 2, 2002. An informal expanded scoping process has been underway since September 2001. Comments received at meetings with interested groups, tribes, and other state and federal agencies have been included as formal scoping comments. Approximately 103 comments were received from letters, comment cards, and verbally. A scoping summary of the SEIS is provided in section II. In section III is a summary of all the comments received.

Planning Process

The Loomis State Forest encompasses approximately 134,000 acres of land in north-central Okanogan County bordered by Canada and is the largest block of state land managed by DNR. The Loomis State Forest includes lands managed under the following designations: Common School Trust Land, Loomis Natural Resource Conservation Areas (LNRCA) and Natural Area Preserve (NAP).

In the summer of 2001, the department began a coordinated planning process to develop a management plan for the newly designated Loomis Natural Resource Conservation Areas (LNRCA) and an updated plan for the Chopaka Natural Area Preserve. Once the LNRCA and Chopaka NAP plans are completed, the 1996 Loomis Forest Landscape Plan will be amended to reflect changes in the management boundaries.

Two watershed analyses, recommended in the 1996 Loomis Landscape Plan and required by recent litigation settlement negotiations, are under development for the Sinlehekin and South Fork Toats Coulee watersheds. Results of the analyses will be incorporated into the 1996 Loomis Forest Plan. The 1996 Landscape Plan will guide management of the Loomis Forest in the interim.

Considerable thought and research went into understanding how SEPA applies to this diverse and complicated planning process. Given the collective nature of all the planning process elements and the DNR's desire to review and address the impacts of its decisions, a supplemental EIS to the current EIS on the Loomis Landscape Plan is being completed.

Comments encouraged the DNR to use a variety of public involvement and outreach methods, including public meetings, individual constituent meetings, field trips, and meetings with other agencies. A transparent process, with written and oral comment opportunities and access to both region and Olympia based staff, helps communicate messages from citizens to all levels of DNR management. Many comments focused on providing easy access to scientific information and ideas, including through the DNR web page. Interested groups also felt that an important component of public outreach is to take time to explain complicated issues in plain terms.

The SEPA process is designed to incorporate public involvement. The Department has posted a number of documents on the DNR web page; these include the Lynx Management Plan, Loomis Landscape Plan, public comments, drafts of documents for review and meeting agendas. Staff involved in planning and writing the different components of the planning process to date have received 100-plus comments and have attended more than 40 meetings with interest groups and other agencies. Exploring the information in a public format has been very helpful in working through issues and forming partnerships for lasting solutions.

Management of the Loomis State Forest

The Loomis State Forest is managed under the Loomis Landscape Plan. The Board of Natural Resources approved the plan and its associated Environmental Impact Statement (EIS) in 1996, after years of public involvement by interested citizens and communities, and the Loomis Advisory Committee. The landscape plan outlines strategies to improve forest health, offer public access for recreation and provide overall guidance for managing the sustainable resources in the Loomis Forest for the benefit of the Common School Trust.

Loomis Natural Resource Conservation Area Lands

DNR manages two natural resource conservation areas totaling 24,600 acres in the northern and southwestern sections of the Loomis Forest. The Board of Natural Resources approved the transfer of Common School Trust land to create the LNRCA in January 2000. DNR is required to write a management plan for the LNRCA and manage it under RCW 79.71 (Natural Resources Conservation Area Act) and the terms of the transfer deed. As a result of a legal settlement, the LNRCA is different from other NRCAs in that acceptable uses include the historic snowmobile and equestrian use and grazing activities.

Lynx Habitat and Conservation

Following the state listing of Canada lynx in 1996, DNR (one of three major non-federal landowners of lynx habitat in Washington State) developed a management plan, (Lynx Habitat Management Plan for DNR Managed Lands) to preserve and enhance Canada lynx habitat. The plan outlines strategies to support the lynx population by improving habitat conditions and reducing the likelihood of significant adverse effects on the lynx. The Lynx Plan has been modified with some mitigation measures, reviewed, and agreed to by the USF&WS that the additional protection measures “are likely to avoid the take of Canada lynx ...”. The plan is being updated due to federal listing of the lynx as a threatened species in 2000. As part of the adaptive management of the modified Lynx Plan the five-year review and update as significant new information becomes available is in process. The DNR is committed to the lynx habitat management plan for its 80-year timeframe or until the lynx is de-listed.

Amendments, Addendums, and Plans

Landscape plan amendments, addendums, and natural area plans will need to be written within the constraints of legal, social, and economic concerns. The amendments and addendums will be guided by the 1996 adaptive management strategies outlined on page 7 of the Loomis State Forest Landscape Plan 1996. Inclusion of current information, technology, a change in regulations, and public concerns is guiding the updating of the management plan and supplementing the EIS.

II. Scoping Summary

The following section summarizes issues of potential significance and the Departments plans for addressing the issues. These responses are intended to help the dialogue that is occurring between the Department and the public. This section is intended to define the scope of the SEIS and explain how the issues not within this SEIS are being dealt with.

Included in the SEIS

A. Several issues that are part of the original 1996 Loomis Landscape Plan and EIS will be reanalyzed:

1) Loomis Landscape Harvest Level Adjustment

Comment: Encompassing comments included that a predictable, sustainable harvest should consider the local economy, rotation ages, sustainability, and protection of the environment.

Response: The harvest level is likely to change since it will reflect the designation of the LNRCA, any influences revealed by the Watershed Analysis and the new Forest Practice's Rules. Harvest will be based on the same fundamental assumptions used in the original plan. The purpose for including this in the SEIS is to allow dialogue between the public and the department on the results and method of "harvest level adjustment calculation". To recalculate the harvest now for the forest as an individual sustainable unit would be an expensive process that is likely to change when the department recalculates the eastern Washington sustainable harvest level. The department's current plans are to recalculate the eastern Washington sustainable harvest in the foreseeable future.

2) Loomis Landscape Plan Late Successional Forest Adjustment

Comment: Conflicting comments were received regarding Late Successional Forest (LSF). Some favored moving the entire LSF block into the NRCA; others advocated excluding the Conservation Lands and having trust lands account entirely for LSF habitat.

Response: Late Successional Forest has specific habitat criteria that are outlined in the original Landscape plan and illustrated with a conceptual map. Biologists and technicians have surveyed

the Loomis forest on the ground and delineated the habitat. As often happens, the field verification revealed some differences from the conceptual plan but the department was able to meet the intent of the LSF section of the landscape plan. Moving the LSF falls outside the intent of the landscape plan. LSF provides a landscape habitat function that is important regardless of the land's designation.

We intend to formalize the status of Late Successional Forest for the Loomis Landscape Plan. The SEIS will look at options for determining the late succesional forest as part of the confirmation process.

3) Loomis Landscape Amendments and Changes

Comments: Input has varied widely on the issues of public use, resource protection, economics, wildlife, fire management, forest health, interagency cooperation, grazing, timber harvest, and process for public participation.

Response: The DNR is committed to an open and transparent process as we work through the changes to the landscape plan. Linkages to the landscape plan with other plans, legal requirements, and land management designations in the Loomis State Forest are important. These will be included in the SEIS process and the landscape plan, the LNRCA Management Plan and have also been addressed in the Chopaka NAP Management Plan, among other documents (i.e. LNRCA SEPA Checklist, and Watershed Analysis SEPA checklist and report). Planning issues will be considered in terms of legal, economic, social and environmental issues. Constraints and consequences will also be considered when the parts of the plan are adjusted to reflect the changes, which have occurred since it was finished in 1996. In some instances the solutions are few and clear; in others there is wider latitude. The DNR will consider the options, choosing what appears to be the best solution for the trust in light of stake-holder interest.

Process for Public Participation: Using a transparent process that follows the SEPA laws is the goal of this planning process.

Public use: (including recreation): further definitions may be added. For some of these, options may be discussed in SEIS. In many cases additional maps in the Landscape plan will help clarify the issue.

Resource Protection: changes will reflect the changes in the forest practice rules, Watershed Analysis, and Modified Lynx Plan.

Timber Harvest: Will be adjusted to reflect the reduced trust acreage in the Loomis Forest and the reduced harvest level.

Wildlife: A linkage to the LSF and Modified Lynx Plan will be shown and the Red Band Trout is being reviewed to determine its presence and, if found to exist, its associated management needs.

B. New since the original 1996 Loomis Landscape Plan and EIS:

1) NRCA Management Plan

Comment: NRCA planning process comments sought information about how the plan would be written and how DNR would deal with issues such as natural processes that could affect neighboring properties. There is interest from a landscape perspective as to how the NRCA lands will be considered in relationship to the Loomis Landscape Plan and large habitat needs (i.e., Lynx and LSF)

Response: The NRCA planning process is working from the large picture down to the details. The first step has been to gather as much information as possible (including scientific, historic and agency knowledge). One of the ways this is being done is through meetings with individual user groups and the public. The plan is likely to have a strong adaptive management component that will allow for adjustments as issues arise. Based on discussions and research, it is expected that the plan will include a description of the area (with maps) and components to address public use and access (recreation), fire management, resource inventory, forest health, habitat and wildlife. Important to the SEIS is how the NRCA fits into the bigger Loomis Forest landscape. There is precedent, e.g. the HCP, to acknowledge the NRCA lands and NAP for their conservation values and the trust lands for their contributions of revenue to the trust. The primary reason to show the connectivity is to assess cumulative effects of the entire DNR ownership. The department is responsible for management regardless of the administrative boundaries. Two options will be discussed in the SEIS: 1) To treat the three ownerships separately; and 2) View the Loomis forest and the lands DNR is held accountable for as one Landscape with lands that have different management objects. Precedent is to treat all lands under DNR management as one-ownership with different management objectives by land designation.

2) Watershed Analysis

Comment: Watershed Analysis should be conducted in an open, honest independent process using the best available science. No timber sales should occur while the analysis is occurring. Other agencies should be solicited and involved in the watershed analysis process.

Response: Watershed analysis utilizes scientific processes closely regulated forest practices law. Landowners in a specified watershed follow prescriptions developed by the watershed analysis team to minimize impacts to public resources when making forest management decisions. The laws allow for continued management while the watershed analysis is in progress. We have invited many agencies and tribes to participate in the process and we anticipate they will be involvement. The SEIS will incorporate the results of the Watershed Analysis by reference as an overlay that will guide SEIS analysis and decision in the Final Landscape Plan.

3) Federal Listing of Canada Lynx and Modified Lynx Management Plan

Comment: Comments regarding lynx included suggestions to add more denning habitat, create more forage habitat, and manage the forest for all species. A number of questions were asked about lynx and their needs, interactions with the United States Fish and Wildlife Service (USFWS) and the federal listing of the lynx.

Response: The Lynx Habitat Management Plan (for DNR Managed Lands) November 14, 1996 can be viewed on the DNR web page www.wa.gov/dnr under site map/index/SEPA Center/Loomis State Forest. The Plan was recently modified per additional protection measures cited in a United States Fish and Wildlife Service letter to DNR (Martin, April 26, 2002). The modified lynx habitat management plan will overlay any new issues analyzed in the SEIS. The SEIS will discuss linkages to the modified lynx plan in terms of the protection measures incorporated into the Loomis Landscape Plan and any proposed amendments.

Phased Review. The department has recently received a letter of agreement from the USFWS that the department's modification to their Lynx Plan and Guidelines is not likely to harm Canada lynx (*lynx Canadensis*).

A Mitigated Determination of Non-significance (MDNS) and environmental checklist was issued on the Modified Lynx Habitat Management Plan May 8, 2002. The MDNS is part of a phased SEPA review process, which will ultimately result in an updated lynx management plan for department-managed land.

The phased SEPA review for the department's Lynx Plan consists of the following steps:

1. The Mitigated Determination of Non-significance on the Modified Lynx Habitat Management Plan (Viada, May 8, 2002) including obligations cited in the USFWS letter to the WDNR (Martin, April 26, 2002).
2. The preparation of a draft and final Loomis State Forest Conservation Plan and SEPA threshold determination currently anticipated for late 2002 incorporating modifications cited in the USFWS lynx take avoidance letter. The conservation plan will cover 24,600 acres of land redesignated from trust to natural resource conservation area status.
3. The preparation of a draft and final updated Loomis State Forest Plan and Supplemental Environmental Impact Statement as is summarized in this Scoping Summary which will incorporate modifications cited in the USFWS lynx take avoidance letter.
4. The final update of the Lynx Plan and SEPA threshold determination currently anticipated for spring 2003 will incorporate current ongoing but yet to be completed lynx habitat research.

For a more complete discussion of the issues regarding the Lynx management plan update please visit the DNR SEPA Center web page listed above.

Outside the scope of the SEIS

C. Issues included in other SEPA processes:

1. Comment: Maintaining biodiversity, protection of wetlands and hydrologic maturity are important components of the environment.

Response: DNR must make sound decisions in the interest of the trust and special lands like the LNRCA. The laws, DNR policies, and the best available science are used in management decisions in this planning process. Hydrologic Maturity is being discussed in Watershed Analysis and could possibly affect the Landscape Plan. If it is determined to have an effect a discussion will be included in the SEIS.

2. Comment: The NRCA should be used for university and classroom studies.

Response: The legislation mandating a management plan for the NRCA offers specific guidance that include outdoor environmental education as one of the most important opportunities these lands provide. Environmental education encompasses both field-based instruction for students of all ages and research opportunities.

3. Comment: Red band trout has been listed as a sensitive species and there is concern for habitat and management decisions.

Response: Although this issue is not currently part of the planning process, DNR will look into it. This issue may become part of the landscape plan or receive habitat consideration through forest practices or the Endangered Species Act.

4. Comment: No motorized vehicle use or grazing should occur in the NRCA.

Response: As part of the legal settlement agreement the DNR agreed to allow grazing and snowmobile use in the NRCA. However, these uses will be managed and impacts to the environment considered. The DNR, its lessees, contractors, and volunteers will continue to use motorized vehicles for management purposes. This can save both time and money, enabling us to more effectively use our resources for better management of the NRCA. This issue will be worked through during the LNRCA Management Plan and associated SEPA Checklist.

5. Comment: Renewal of the Forest Resources Plan.

Response: This action is independent of this planning process. However the Forest Resource Plan has been extended for an additional three years ending June 30, 2005.

6. Comments: Comments about the LNRCA management plan have varied widely and show a range regarding issues of public use, resource protection, economics, wildlife, fire management, forest health, interagency cooperation, grazing, and process for public participation.

Response: DNR is trying to conduct an open process to develop a management plan that will consider all comments. An environmental checklist will be completed for the management plan of the LNRCA and the linkages will be shown in the SEIS. Evaluation of the various issues to be addressed in the plan will identify potential solutions in terms of what is legally, economically, socially and environmentally possible. The public's input through the scoping process will be

helpful in identifying alternative approaches and reaching good decisions for addressing issues that have a range of options. Public input is equally valuable in regard to issues for which the options are limited and only a few solutions seem suitable. It is very important all the linkages across the landscape are recognized and accounted for at the end of the planning process.

D. Issues outside the scope of the SEIS:

1. Comment: Road abandonment is a waste of taxpayers' money.

Response: Road abandonment is sometimes a result of regulatory or legal requirements. In other instances road abandonment choices are made for environmental or economic reasons. When evaluating road abandonment options DNR staff usually will review alternatives and short term and long-term impacts and seek cost effective solutions. DNR does not anticipate making changes to the road maintenance and abandonment plan for the Loomis landscape plan other than to reflect the addition of the LNRCA and potential changes prompted by the Watershed Analysis.

2. Comment: Where has the money gone from the NRCA and what is it being used for?

Response: The DNR received \$16.54 million for the Loomis transfer. After legislation enabling the transaction was passed, the timber value (approximately \$13.45 million of the 16.54 million) was deposited in the Common School Construction Account to pay for construction of K-12 schools and the land value (approximately \$3 million) was forwarded to the Real Property Replacement Account. The \$3 million will be used to buy revenue-producing land for the Common School Trust.

3. Comment: The Landscape Plan should be re-written from scratch to consider all the issues that are part of the Loomis State Forest.

Response: The Landscape Plan was written with an adaptive management strategy to allow for change over time. Lasting decisions are made considering the economic, environmental, and social components of environmental issues. While significant time and energy went into defining the decision space in the original plan it was also recognized that over time, aspects of the three factors would change. The current planning process is an effort to make effective changes efficiently.

4. Comment: The Endangered Species Act is being used to stop public use.

Response: The DNR has no jurisdiction over the ESA listing process. Once a species is listed, it sometimes results in different, less, or minimal public use in specific areas. These determinations are reached through a consultation process with the USFWS.

5. Comment: The existing plan has not been fully implemented and funding has not been provided to meet the needs of the plan. Additional comments addressed landscape plan implementation and provided operationally oriented suggestions regarding grazing, forestry and public use.

Response: Funding for field-operations is a complicated issue that involves the distribution of land management dollars across the entire state. While the Loomis State Forest receives its share, depending on timber markets and legislative direction in some years it may not receive enough money and staff to address every detail of the plan. In the Loomis Forest the DNR manages these priorities in accordance with guidance from the Board of Natural Resources under limited resources conditions. When this planning process is done, the DNR will be able act on the amendments, addendums, and plans implementing the decisions across the Loomis State Forest

III. Closing

This SEPA – SEIS process is designed to incorporate public involvement and narrow the discussion of the SEIS to significant issues. DNR has chosen to maximize the public’s involvement opportunities through SEPA by providing extensive opportunities for participation. We have used an expanded scoping in the Loomis Forest Planning process, which has to date included three public meetings. The agency has posted a number of documents on the DNR web page www.wa.gov/dnr for easier access; these include the Lynx Habitat Management Plan, Loomis Landscape Plan, Scoping notice for updating the Loomis Landscape Plan and response summary to expanded scoping, opportunities for public involvement, drafts of documents for review and meeting agendas. The Department has received numerous comments. We have also attended more than 30 meetings with interest groups and other agencies. Exploring the information in a public format has been very helpful in working through issues and forming parameters for lasting solutions.

Thank you for your comments and involvement. If you have any questions regarding this summary or the status of addressing various issues discussed in this summary, please contact Andrew Stenbeck at (509) 684-7474 or the DNR SEPA center web site www.wa.gov/dnr. The DNR looks forward to continued collaboration through the department’s SEPA and planning processes.

Appendix

Scoping Comment Summary

Scoping is an important formal step in the SEIS process. It is intended to initiate public involvement in the SEIS process, narrow the focus of the SEIS to significant environmental issues, and eliminate those that are insignificant or not directly related to the proposal. Section II provided a summary of scoping and the department's plans for addressing issues. The following comments have been received during the scoping process related to the Loomis Landscape plan and associated planning efforts. The bullets below in some instance were summarized to include several comments with the same content but were expressed differently. This was done for easier reading.

Economic Impacts

- The Loomis State Forest is a vital source of irrigation water for many family owned agricultural businesses.
- Forest management has an effect on runoff in the spring and during the summer but irrigation needs would be better served by management, which sustains runoff throughout the season.
- Effect of low or unreliable harvest levels on local mill operations.
- The NRCA has reduced the tax base for the county.
- Recreation is an important part of the Okanogan county economy.

Fire Management

- A healthy forest is important to managing fires.
- Big fires, especially in areas like the NRCA, could compromise the quantity and quality of useable water for irrigation purposes.
- Fuel breaks and forest management would benefit the health of the forest and reduce the impacts to the environment.
- Fire is a natural process and DNR could consider letting some fires burn, especially in the NRCA/NAP.
- A post-fire rehabilitation plan is needed for NRCA/NAP lands.
- Grazing can reduce fire risk by reducing available fuels.

Forest Health and Environment

- Concerns stated include maintaining a functional forest ecosystem for wildlife, natural resource extraction, recreation, grazing, forest pathogens, beetle outbreaks, and fire management.
- Protection of aspen stands.
- The role of insect outbreaks and pathogens in a healthy forest.
- Wise use of the forest along with protection of the resources.
- Maintenance of biological diversity and control of exotic species.

Grazing

- Recognition of grazing as a historic use from the 1800s
- Continuing grazing.
- Monitoring of grazing for effects on the ecosystem and restriction if damage is occurring.
- A proposal for using the NRCA as a demonstration area for good grazing practices.
- No net loss of Animal Unit Month (AUM) in the Loomis State Forest, including the NRCA and NAP.
- Consideration for whether grazing should be permitted on Chopaka NAP.
- Given the historic grazing of the NAP, some would like a study to determine whether grazing was beneficial to the site.
- Some recommended mitigation for the loss of grazing in the NAP. They desire continued grazing in the NRCA, without reduction through “unrealistic rules, restrictions, and management plans.” They stated that range management decisions should be made with the help of the NRCS and permittees who have generations of experience.
- Some proposed banning grazing from most areas to avoid damage to sensitive plants, soils and water quality.
- Timely response to cattle grazing issues and complaints (such as the driving hazard caused by cattle on roadways) as a part of resource protection.
- Removing slash from logged areas and seeding grass for grazing. Spraying or burning sagebrush areas to create more forage.
- Using the SEPA process for grazing permit renewals.
- Control of noxious weeds to improve grazing.

Harvest Level

- Setting a sustainable harvest level that does not negatively impact the indigenous wild animals and plants.
- Setting a minimum harvest cycle age of 90 to 100 years.
- Considering the Loomis State Forest as an individual sustainable unit, and not including the non-harvestable areas in the calculation of the harvest level adjustment.
- The importance of a sustainable harvest to the local economy.

Interagency Cooperation

- Comments stated that the planning process should involve Natural Resources Conservation Service, United States Forest Service, Washington State Department of Fish and Wildlife and United States Fish and Wildlife Service.

Landscape Plan Implementation

- Implementation of the riparian management and monitoring component.
- Consideration for using the Loomis State Forest as an experimental forest for evolving forest systems.
- Funding for full implementation of the current plan, and not using lack of funds as an excuse to not fulfill obligations.
- Consider requiring yearly reports of Loomis State Forest management activities.
- Consider a visit to every proposed timber sale by a degreed silviculturist and entomologist, with reports available to the public.

- Using/not using the NRCA in calculating the cumulative impacts.
- Consider creating a buffer by not allowing large even-aged harvest contiguous to the NRCA.

Late Successional Forest

- Written and oral comments stated that it is important that DNR maintain late successional forest characteristics (structure and function) throughout the forest, especially in the lower elevation Douglas fir zone.
- Permanence and connectivity of legacy trees across the landscape.
- Can the entire LSF block be moved into the NRCA lands that are already managed for conservation purposes?

Loomis Planning Process

- Manage trust lands, NAP lands, and NRCA lands separately and independently, each according to its own management plan.
- Consider the ecological impacts and interconnectivity of the entire landscape as a whole without distinguishing among land management designations.
- Modeling the Loomis plan on those for the Tiger Mountain State Forest and the Olympic State Forest.
- Putting the landscape plan through the green certification process.
- Lengthening rotation ages.
- Delaying the Loomis SEIS until the Forest Resource Plan and EIS are updated and approved.
- Considering ongoing management activities when revising the Loomis Landscape Plan.
- Considering whether to scrap the current landscape plan and develop a new one.
- Building public trust during this planning process.

Lynx Management

- Concerns and questions included where to use current science and studies. What is good habitat? Do lynx travel across the border?
- Presence and distribution of denning opportunities across each LAU. Attainability of more denning sites than two per section.
- Lynx need rabbits for food and logging produces food for rabbits, thus more rabbits.
- Review and updating of the lynx plan to reflect the listing of the lynx by the USFWS and evaluating the plan through SEPA and NEPA.
- Applying guidance from the United States Fish and Wildlife Service and the Washington State Department of Fish and Wildlife.

NAPs

- Stated concerns included a desire for better information on what is in the NAP, studies, and threats.
- Has the fence helped or hurt the protected plants?
- Clearly marking the boundaries.
- Opening the NAP to hiking, horsemen, and snowmobiles.

NRCAs

- Comments ranged across the spectrum, from allowing all natural processes to occur to conducting management that prevents resource impacts and allows for a broad range of uses and studies.
- Road abandonment
- Whether to allow unimpeded natural processes of forest insects, disease and fire to help diversify the resources.
- Fire management in the NRCA.
- Will the NRCA stay as is or will it be closed like the NAP? Should vehicles be allowed?
- What happened to the money raised and paid for the NRCA?
- Should the southern block of the NRCA lands should be a wilderness with minimal recreational options?
- Acknowledge the NRCA and NAP as places of incredible wildlife habitat which can provide older forest habitat.
- Noxious weed control and eradication are important concerns.
- DNR staff accountability for the implementation of the NRCA management plan.

Policy Issues

- How the Forest Resources Plan affects Loomis.
- Legacy trees.
- Alternate sources of funding than timber harvest.
- Keeping Responsible SEPA Officials free of involvement in the SEIS process or the preparation of the documents.

Public Outreach

- Facilitating participation in public involvement by scheduling meetings at times that don't conflict with other community meetings or events.
- Keep process open. Consider attending organized group monthly meeting for constituents.
- Provide more information to enable adequate comment on the proposed plan revision.
- Whenever possible, provide information in plain language rather than using technical and legal terms.
- Provide a summary of accomplishments that explain the implementation goals of the plan to date.
- Post-relevant information on the DNR Website.
- Can the citizens be allowed to choose the best alternative when more than one exists?

Public Use

- A broad range of comments called for recognizing the social and economic value of recreational opportunities, impacts to the natural resources, impacts to wildlife, impacts to historical use, historic site management (cabins, drive trails, etc.).
- Examine equine use, snowmobiling, snowshoeing, hiking, dog sledding, mountain biking, camping, ORV use, hunting and fishing.
- Consider having DNR staff lead visits to sites where issues exist to discuss solutions.
- Maintenance standards for trails and roads.

- Concern about ESA as an issue to reduce use.
- Monitoring recreation for impacts to wildlife and native vegetation.
- Restricting snowmobile use to trails.
- Whether to have motorized use in the NRCA.
- Allowing motorized access for the aged, infirm, and handicapped to areas that would otherwise be restricted.
- Staffing to manage recreational use.
- Road gating and closures.
- Punishment for acts of vandalism and destruction by the public.
- Multiple use on all the lands in the Loomis State Forest.
- More and better signage.

Research/Educational Opportunities

- The NRCA as a living classroom for school children and institutions of higher learning for earning degrees and college credits.
- Interpretive and self taught education opportunities in the NRCA.
- Importance of monitoring in the Loomis Landscape Plan, especially in areas of defining Late Successional Forest.

Resource Protection

- Wider riparian zones and protection of wetlands, springs, and streams to protect sensitive and complex plant communities and reduce sediment.
- Road management to protect against sediment delivery to streams.
- Maintaining biodiversity and ecosystem values on the Loomis State Forest trust lands.
- Defining hydrologic maturity: United States Forest Service's calculation approach vs. the 40% in the original Loomis Landscape Plan.

Watershed Analysis

- Protecting water quality and soils from erosion.
- Conducting watershed analysis in an open, honest, independent process using the best available science. Should timber sales occur during the analysis?

Wildlife

- Consider red-band trout, a native unique species, when logging, road building, grazing.
- Bring back the beaver.
- Maintaining habitat and travel corridors for all species independent of forest management objectives.

In summary the Department appreciates all the time and effort that has gone into these comments. They reflect the thoughtfulness and concern for the management of the Loomis State Forest.